

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, DC**

-----X  
In the matter of :

LightSquared Subsidiary LLC :

Application for Modification of its Authority :  
For an Ancillary Terrestrial Component :  
-----X

IB Docket No. 11-109

FILED/ACCEPTED

AUG 15 2011

Federal Communications Commission  
Office of the Secretary

**REPLY COMMENTS OF THE  
AIR TRANSPORT ASSOCIATION OF AMERICA, INC.**

The Air Transport Association of America, Inc. ("ATA")<sup>1</sup> stated in its July 29, 2011 comments in this proceeding that:

- We do not oppose the expansion of wireless broadband services but any such expansion cannot be permitted to interfere with existing or anticipated civil aviation GPS spectrum use.
- LightSquared's application cannot be approved. The results of the technical working group's examination of the operational implications of the application, RTCA's related analysis and the Federal Aviation Administration's assessment each unequivocally demonstrates that LightSquared's proposal will result in loss of aviation GPS use over entire regions of the United States.
- GPS users, including the civil aviation community, should not be required to undertake measures to mitigate interference that arises from LightSquared's system – either as originally proposed or more recently modified.

Our views have not changed.

The accuracy, availability and functionality of the GPS system must be maintained undisturbed. Our society, as the comments in this docket repeatedly illustrate, is overwhelmingly dependent upon GPS. This dependence is extraordinary; GPS has become an indispensable public facility and will be more so in the future. More particularly, as we noted in our July 29<sup>th</sup> comments, civil aviation air navigation modernization, capacity enhancements, and improved safety are equally dependent on GPS. These considerations, however, affect not only the users of the airspace

<sup>1</sup> ATA airline members are: ABX Air, Inc.; AirTran Airways, Inc.; Alaska Airlines, Inc.; American Airlines, Inc.; ASTAR Air Cargo, Inc.; Atlas Air, Inc.; Continental Airlines, Inc.; Delta Air Lines, Inc.; Evergreen International Airlines, Inc.; Federal Express Corp.; Hawaiian Airlines, Inc.; JetBlue Airways Corp.; Southwest Airlines Co.; United Air Lines, Inc.; UPS Airlines; and US Airways, Inc. ATA associate members are Air Canada and Air Jamaica Ltd.

No. of Copies rec'd 0+1  
List A B C D E

system but also those passengers, shippers, businesses and communities that rely on air transportation. LightSquared's application has unprecedented implications for air transportation.

Comments submitted in this docket express GPS users' repeated conclusions that LightSquared has not made the case for allowing its application to be approved. They again and again describe the harms to their public safety responsibilities, livelihoods and recreational uses that are directly at issue in this proceeding. Indeed, these effects have substantial international implications. That is a point made in the July 19, 2011 comments of the European Commission.

GPS users have transformed their operations and made substantial investments relying on the continued integrity of this technology. This is especially so in the U.S. airline industry, which is transitioning to a GPS-based air navigation system. That will be an expensive transition—for users of the airspace and the Federal Aviation Administration which is responsible for the transition. It is far too important to be put at risk in any way. And we should not be saddled with the additional cost of accommodating our systems to an individual vendor's business plan that should have reflected society's dependence on GPS in its formulation.

Respectfully submitted,



James L. Casey  
Vice President & Deputy General Counsel  
Air Transport Association of America, Inc.  
1301 Pennsylvania Ave., NW  
Washington, DC 20004-1707  
202.626.4000  
[jcasey@airlines.org](mailto:jcasey@airlines.org)

August 15, 2011